

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA)

DOCKET NO. 3:06CR0074

V.)

UNDER SEAL

RICKY EDWARD GRAVES)
_____)

FILED
CHARLOTTE, N. C.

AUG 16 2006

U. S. DISTRICT COURT
W. DIST. OF N. C.

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA)	DOCKET NO. 3:06CR0074
)	
)	
V.)	<u>MOTION TO MODIFY CONDITIONS OF RELEASE</u>
)	
RICKY EDWARD GRAVES)	
_____)	

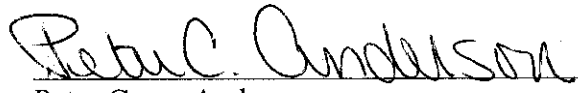
NOW COMES the Defendant, Ricky Edward Graves, through the undersigned counsel, Peter Crane Anderson, and hereby moves the court to modify the current conditions of release by allowing the Defendant to travel outside of the States of North and South Carolina for a limited period, as long as the Defendant makes these travel plans known in advance to his United States Probation Officer.

In support of this motion, the Defendant would show the following:

1. Defendant was Indicted by a Grand Jury on April 4, 2006
2. On April 18, 2006, the Court issued an Order Setting Conditions of Release and the Defendant signed a \$100,000.00 unsecured bond.
3. To date, Defendant has abided by all of the terms of his bond.
4. One condition of the bond was that the Defendant is restricted to travel only in North and South Carolina.
5. The Defendant wishes to take his wife and two small children on a family vacation and wishes to add the states of Virginia, Georgia and Florida as unrestricted travel states.

The Defendant therefore respectfully requests that the Court modify the Defendant's conditions of release by allowing the Defendant to travel to Florida, Georgia and Virginia as long as the Defendant makes these travel plans known in advance to his United States Probation Officer.

Respectfully submitted this 16th day of August, 2006

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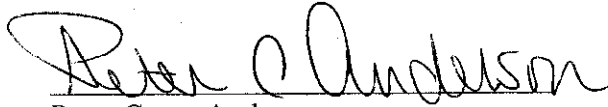
Peter Crane Anderson
Shumaker, Loop & Kendrick, LLP
128 S. Tryon Street, Suite 1800
NC State Bar # 18661
Charlotte, NC 28207
(704) 375-0057

CERTIFICATE OF SERVICE

This is to certify that I caused a copy of the foregoing to be served on the following individual(s) by depositing a copy of the same in the United States mail, first class, postage prepaid and addressed as follows:

Matthew Martens
Assistant United States Attorney
227 West Trade Street, Suite 1700
Charlotte, North Carolina 28202

This the 16th day of August, 2006.


Peter Crane Anderson kg